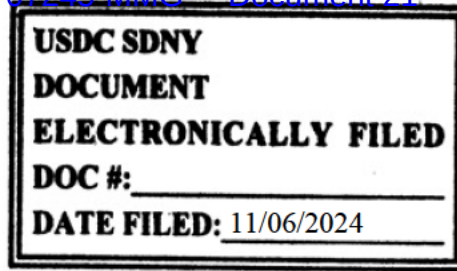


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November 4, 2024

VIA ECF

The Honorable Margaret M. Garnett
United States District Judge, SDNY
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 100067

Re: NRD Group LLC, et al. v. Centiva Capital, LP, 24-CV-07245

Dear Judge Garnett,

We represent Defendant Centiva Capital, LP (“Centiva”) in the above-referenced action. On September 25, 2024, Plaintiffs NRD GP LLC and Nebula Research & Development LLC (“Nebula”) filed a Complaint with this Court under seal (ECF 1). Accordingly, we write to respectfully request permission to file Centiva’s Motion to Dismiss under seal as it potentially contains the parties’ proprietary, commercially sensitive, or trade secret information.

Centiva disputes that Nebula’s Complaint contains any trade-secret information or that Plaintiffs have articulated a viable trade-secret misappropriation theory. However, out of an abundance of caution, Centiva requests that its papers be filed under seal, in deference to the redactions in Nebula’s Complaint.

Nebula has consented to Centiva’s request to file the motion to dismiss under seal. The parties will confer in the next three business days on the proposed redactions to the Motion to Dismiss and Centiva will file a public version of its Motion to Dismiss by close of business on or before November 7. Centiva reserves the right to challenge the redactions in the Complaint and to later revise the redactions to Centiva’s Motion to Dismiss.

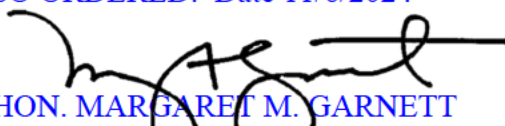
Respectfully submitted,

May K. Chiang

May K. Chiang
Counsel for Centiva Capital

The request to file Defendant's motion to dismiss under seal is provisionally GRANTED. By **November 8, 2024**, Defendant must propose and request redactions to the motion to dismiss in accordance with Rule I(D)(3) of the Court's Individual Rules & Practices. The Clerk of Court is directed to terminate Dkt. No. 16.

SO ORDERED. Date 11/6/2024



HON. MARGARET M. GARNETT
U.S. DISTRICT JUDGE